

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

<p>In re:</p> <p>EUGENE GREENLIEF</p> <p>Debtor,</p> <p>SPECIALIZED LOAN SERVICING, LLC, AS SERVICER FOR DEUTSCHE BANK NATIONAL TRUSTEE COMPANY, AS TRUSTEE FOR MORGAN STANLEY ABS CAPITAL I INC. TRUST 2006-HE3 MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-HE3,</p> <p>Movant,</p> <p>v.</p> <p>EUGENE GREENLIEF, and CHARLES J. DEHART, III, Chapter 13 Trustee</p> <p>Respondents.</p>	<p>Bankruptcy No. 5:18-bk-04623-JJT</p> <p>Chapter 13</p> <p>Related to Document No. 10</p>
--	---

**OBJECTION TO CONFIRMATION OF PLAN DATED OCTOBER 31, 2018**

AND NOW COMES, Specialized Loan Servicing, LLC, as servicer for Deutsche Bank National Trustee Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2006-HE3 Mortgage Pass-Through Certificates, Series 2006-HE3 (“Movant”), by and through its undersigned counsel, Bernstein-Burkley, P.C., and files this Objection to Confirmation of Chapter 13 Plan Dated October 31, 2018, stating as follows:

1. Movant, is a corporation with offices located in Littleton, CO.
2. Respondent, Eugene Greenlief (the “Debtor”) filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on October 31, 2018 (the “Petition Date”).
3. Movant holds a Mortgage on the real property located at 1129 Woodland Drive, East Stroudsburg, PA 18301, pursuant to a Mortgage and Note recorded at Instrument Number 200600131 in the public records of Monroe County, PA.
4. Movant objects to the confirmation of the Debtor’s Chapter 13 Plan to request clarification of the treatment of pre-petition arrears.

5. Movant timely filed its Proof of Claim on November 12, 2018 at Claim 2-1. Movant's claim shows prepetition arrears of \$4,940.08. While the Plan proposes to pay the Movant directly, the prepetition arrears are not listed in the Plan. Debtor should amend the Plan to propose to pay the prepetition arrears in full.

WHEREFORE, Movant, Specialized Loan Servicing, LLC, respectfully requests that this Honorable Court deny confirmation of Debtor's Chapter 13 Plan dated October 31, 2018.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Keri P. Ebeck  
Keri P. Ebeck  
PA I.D. # 91298  
kebeck@bernsteinlaw.com  
707 Grant Street, Suite 2200  
Pittsburgh, PA 15219  
412-456-8112  
Fax: (412) 456-8120

*Counsel for Specialized Loan Servicing, LLC, as  
servicer for Deutsche Bank National Trustee  
Company, as Trustee for Morgan Stanley ABS  
Capital I Inc. Trust 2006-HE3 Mortgage Pass-  
Through Certificates, Series 2006-HE3*

Dated: November 21, 2018